

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEM  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE  
ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and Defendant C.R. Bard, Inc. (“Bard”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Bard is the only defendant in the listed actions. Accordingly, Plaintiffs and Bard jointly move the court to dismiss with prejudice, parties to bear their own costs, and terminate from the docket of the court the actions listed on the attached Exhibit A.

Respectfully:

/s/ Richard B. North, Jr.  
NELSON MULLINS RILEY & SCARBOROUGH LLP  
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*Attorney for Defendant C.R. Bard, Inc.*

/s/ Caroline L. Maida  
MOSTYN LAW FIRM  
3810 West Alabama Street  
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*Attorney for Plaintiffs on Exhibit A*

Dated: March 12, 2019

**EXHIBIT A – MOSTYN LAW FIRM**

<b>CIVIL ACTION NUMBER (listed numerically in ascending order)</b>	<b>CASE NAME</b>
2:14-cv-11385	Elizabeth Tyrrell v. C.R. Bard, Inc.
2:14-cv-23172	Deborah (Debbie) L. Jenson and R. Wesley Jenson v. C.R. Bard, Inc.
2:14-cv-31375	Phoebe H. Goulkin v. C.R. Bard, Inc.
2:16-cv-11460	Karen Jones v. C.R. Bard, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 12, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Richard B. North, Jr.